

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-11068 (JTD)
)
) (Jointly Administered)
)
) **Obj. Deadline: August 14, 2023 at 4:00 pm**
) **(ET)**

**SUMMARY COVER SHEET TO THE SIXTH MONTHLY FEE APPLICATION
OF FTI CONSULTING, INC., FINANCIAL ADVISOR TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD
MAY 1, 2023 THROUGH MAY 31, 2023**

| | |
|---|---|
| Name of Applicant: | FTI Consulting, Inc. |
| Authorized to provide professional services to: | Official Committee of Unsecured Creditors |
| Date of Retention: | Order entered February 15, 2023, effective as of December 22, 2022 [Docket No. 730] |
| Period for which compensation and reimbursement are sought: | May 1, 2023, through May 31, 2023 |
| Amount of compensation sought as actual, reasonable, and necessary: | \$2,279,011.60 (80% of \$2,848,764.50) |
| Amount of expense reimbursement sought as actual, reasonable, and necessary: | \$1,404.78 |
| This is an: <u> X </u> monthly <u> </u> interim <u> </u> final application. | |

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

COMPENSATION BY TIMEKEEPER

| Professional | Position | Specialty | Billing Rate | Total Hours | Total Fees |
|------------------------|-----------------|---------------------|---------------------|--------------------|------------------------|
| Chesley, Rachel | Sr Managing Dir | Communications | \$ 1,075 | 1.7 | \$ 1,827.50 |
| Baldo, Diana | Sr Consultant | Communications | 525 | 6.0 | 3,150.00 |
| McNew, Steven | Sr Managing Dir | Cryptocurrency | 1,200 | 21.3 | 25,560.00 |
| Carter, Michael | Sr Managing Dir | Cryptocurrency | 1,200 | 58.7 | 70,440.00 |
| de Brignac, Jessica | Managing Dir | Cryptocurrency | 910 | 61.2 | 55,692.00 |
| Sheridan, Jeremy | Managing Dir | Cryptocurrency | 910 | 4.0 | 3,640.00 |
| Leonaitis, Isabelle | Sr Consultant | Cryptocurrency | 595 | 45.4 | 27,013.00 |
| Vazquez Ortiz, Fredrix | Sr Consultant | Cryptocurrency | 595 | 4.0 | 2,380.00 |
| Kamran, Kainat | Consultant | Cryptocurrency | 440 | 63.5 | 27,940.00 |
| Dack, Carter | Consultant | Cybersecurity | 475 | 15.7 | 7,457.50 |
| Busen, Michael | Sr Managing Dir | Data & Analytics | 1,325 | 10.7 | 14,177.50 |
| Garofalo, Michael | Senior Director | Data & Analytics | 935 | 50.1 | 46,843.50 |
| Jordan, Mason | Sr Consultant | Data & Analytics | 635 | 126.6 | 80,391.00 |
| Kimche, Livia | Consultant | Data & Analytics | 475 | 28.7 | 13,632.50 |
| Risler, Franck | Sr Managing Dir | Derivatives | 1,725 | 118.3 | 204,067.50 |
| Roussikh, Valeri | Managing Dir | Derivatives | 1,300 | 154.5 | 200,850.00 |
| Diodato, Michael | Managing Dir | Derivatives | 1,210 | 173.7 | 210,177.00 |
| Kubali, Volkan | Managing Dir | Derivatives | 1,210 | 121.1 | 146,531.00 |
| Majkowski, Stephanie | Senior Director | Derivatives | 1,100 | 143.5 | 157,850.00 |
| Guo, Xueying | Director | Derivatives | 975 | 107.0 | 104,325.00 |
| Langer, Cameron | Director | Derivatives | 920 | 168.7 | 155,204.00 |
| Greenblatt, Matthew | Sr Managing Dir | Forensic Accounting | 1,325 | 3.1 | 4,107.50 |
| Baer, Laura | Senior Director | Forensic Accounting | 975 | 20.3 | 19,792.50 |
| Fiorillo, Julianna | Director | Forensic Accounting | 835 | 143.6 | 119,906.00 |
| Anastasiou, Anastis | Director | Forensic Accounting | 785 | 121.5 | 95,377.50 |
| Steven, Kira | Director | Forensic Accounting | 835 | 64.8 | 54,108.00 |
| Famiglietti, Tyler | Sr Consultant | Forensic Accounting | 695 | 77.9 | 54,140.50 |
| Marsella, Jenna | Sr Consultant | Forensic Accounting | 635 | 61.2 | 38,862.00 |
| Stillman, Beulah | Consultant | Forensic Accounting | 475 | 95.7 | 45,457.50 |
| Rothschild, Elijah | Consultant | Forensic Accounting | 475 | 156.8 | 74,480.00 |
| Shaik, Ismail | Consultant | Forensic Accounting | 475 | 107.5 | 51,062.50 |
| Reid, Matthew | Consultant | Forensic Accounting | 475 | 153.6 | 72,960.00 |
| Simms, Steven | Sr Managing Dir | Restructuring | 1,495 | 33.0 | 49,335.00 |
| Joffe, Steven | Sr Managing Dir | Restructuring | 1,325 | 13.6 | 18,020.00 |
| Diaz, Matthew | Sr Managing Dir | Restructuring | 1,325 | 79.3 | 105,072.50 |
| Bromberg, Brian | Managing Dir | Restructuring | 985 | 205.9 | 202,811.50 |
| Gray, Michael | Sr Consultant | Restructuring | 695 | 158.3 | 110,018.50 |
| Dawson, Maxwell | Sr Consultant | Restructuring | 635 | 152.6 | 96,901.00 |
| Sveen, Andrew | Consultant | Restructuring | 475 | 118.1 | 56,097.50 |
| Feldman, Paul | Senior Director | Risk Management | 955 | 22.1 | 21,105.50 |
| GRAND TOTAL | | | | 3,273.3 | \$ 2,848,764.50 |

COMPENSATION BY PROJECT CATEGORY

| Task Code | Task Description | Total Hours | Total Fees |
|--------------------|--|--------------------|------------------------|
| 1 | Current Operating Results & Events | 17.5 | \$ 21,466.50 |
| 2 | Cash & Liquidity Analysis | 127.6 | 104,159.50 |
| 9 | Analysis of Employee Comp Programs | 1.5 | 952.50 |
| 10 | Analysis of Tax Issues | 23.3 | 25,664.50 |
| 13 | Analysis of Other Miscellaneous Motions | 5.2 | 4,542.00 |
| 14 | Analysis of Claims/Liabilities Subject to Compromise | 374.8 | 411,474.00 |
| 16 | Analysis, Negotiate and Form of POR & DS | 362.8 | 303,888.00 |
| 18 | Potential Avoidance Actions & Litigation | 1,358.7 | 935,678.00 |
| 21 | General Meetings with UCC and UCC Counsel | 49.2 | 62,685.00 |
| 24 | Preparation of Fee Application | 102.6 | 57,610.00 |
| 26 | Cryptocurrency/Digital Assets Issues | 696.2 | 759,997.50 |
| 27 | Communications Planning & Execution | 8.6 | 6,102.00 |
| 28 | Cybersecurity Issues and Analysis | 15.7 | 7,457.50 |
| 29 | Exchange Restart | 129.6 | 147,087.50 |
| GRAND TOTAL | | 3,273.3 | \$ 2,848,764.50 |

SUMMARY OF EXPENSES

| Expense Type | Amount |
|--------------------------|--------------------|
| Electronic Subscriptions | \$ 1,254.99 |
| Transportation | 79.22 |
| Working Meals | 70.57 |
| GRAND TOTAL | \$ 1,404.78 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

) Chapter 11

) Case No. 22-11068 (JTD)

) (Jointly Administered)

) Obj. Deadline: August 14, 2023 at 4:00 pm
(ET)

**SIXTH MONTHLY FEE APPLICATION OF FTI CONSULTING, INC., FINANCIAL
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
MAY 1, 2023 THROUGH MAY 31, 2023**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Administrative Order”) [D.I. 435], the consulting firm FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI”), as financial advisor to the Official Committee of Unsecured Creditors (the “Committee”) appointed in these chapter 11 cases, hereby submits this *Sixth Monthly Fee Application of FTI Consulting, Inc., Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

Compensation for Services Rendered and Reimbursement of Expenses for the Period May 1, 2023 to May 31, 2023 (the “Application Period”).

BACKGROUND

1. On November 11 and November 14, 2022² (separately or collectively, the “Petition Date”), the Debtors commenced these chapter 11 cases by filing petitions for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”).

2. On December 20, 2022, the U.S. Trustee filed an *Amended Notice of Appointment of Committee of Unsecured Creditors* [D.I. 261] appointing the Committee.

3. On February 15, 2023, the Court entered the *Order Authorizing Retention of FTI Consulting, Inc. as Financial Advisor for the Official Committee of Unsecured Creditors* [D.I. 730] (the “Retention Order”).

RELIEF REQUESTED

4. FTI submits this Fee Application pursuant to the Bankruptcy Rules, the Administrative Order, and the Retention Order. By this Fee Application, FTI seeks (i) allowance of compensation for actual and necessary professional services rendered in the amount of \$2,848,764.50 for the Application Period, (ii) payment of \$2,279,011.60 (80% of the total fees for the Application Period), and (iii) reimbursement of \$1,404.78 for actual and necessary expenses incurred, in accordance with the terms of the Administrative Order. FTI reserves the right to request, in subsequent fee applications, reimbursement of any additional fees and expenses incurred during the Application Period, as such fees and expenses may not have been captured in FTI’s billing system as of the date of filing this Fee Application.

² November 11, 2022 is the Petition Date for all Debtors, except for Debtor West Realm Shires Inc.

SUMMARY OF FEES

5. The total number of hours expended by FTI professionals and paraprofessionals in performing services for the Committee during the Application Period was 3,273.3 hours. Pursuant to the Retention Order, FTI is entitled to monthly compensation for its services provided to the Committee at its current hourly rates, plus reimbursement of necessary out of pocket expenses.

6. Services rendered by (i) each professional and paraprofessional, (ii) a summary of the time incurred by task, (iii) detailed time entries during the Application Period, (iv) summary of the expenses incurred by task, and (v) detailed expense entries are attached hereto as **Exhibit A, Exhibit B, Exhibit C, Exhibit D, and Exhibit E**, respectively.

7. Services provided by FTI during the Application Period included, but were not limited to, analysis of the Debtors' cash holdings and liquidity, claims valuation analysis, waterfall recovery analysis, investigative work regarding potential avoidance actions and litigation, analysis regarding the Debtors' cryptocurrency and digital asset holdings, analysis of the Debtors' cybersecurity environment and related issues, and work regarding the possibility of a restart of the Debtors' pre-petition exchange.

ACTUAL AND NECESSARY EXPENSES

8. FTI also incurred actual and necessary out-of-pocket expenses in the amount of \$1,404.78. **Exhibit E** also includes a detailed statement of this expense broken down by category. FTI reserves the right to request, in subsequent fee applications, reimbursement of any additional expenses incurred during the Application Period, as such expenses may not have been captured in FTI's billing system on the date of filing this Fee Application.

CONCLUSION

WHEREFORE, FTI respectfully requests allowance of compensation for professional services rendered as financial advisor to the Committee during the Application Period in the amount of \$2,848,764.50 and actual and necessary expenses incurred in the amount of \$1,404.78, and payment of \$2,279,011.60 (80% of the total fees for the Application Period and 100% of expenses) pursuant to the Administrative Order, and such other and further relief that the Court deems just and proper.

Dated: July 25, 2023

FTI CONSULTING, INC.

By: /s/ Matthew Diaz

Matthew Diaz
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New York, NY 10036
Telephone: 212-499-3611
E-mail: matt.diaz@fticonsulting.com

Financial Advisors to the Official
Committee of Unsecured Creditors of
FTX Trading Ltd., *et al.*

VERIFICATION PURSUANT TO DEL. BANKR. L.R. 2016-2(g) AND 28 U.S.C. § 1746

I, Matthew Diaz, pursuant to 28 U.S.C. § 1746, to the best of my knowledge and belief, and after reasonable inquiry, declare as follows:

1. I am a Senior Managing Director with the consulting firm FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI”). FTI has rendered professional services to the Official Committee of Unsecured Creditors (the “Committee”) in these Chapter 11 cases.

2. I have read the foregoing statement of FTI for compensation and reimbursement of expenses (the “Fee Application”). To the best of my knowledge, information and belief formed upon the basis of my participation in this case, as well as after reasonable inquiry, the facts set forth in the foregoing Fee Application are true and correct and materially comply with the applicable orders, rules, guidelines, and requirements as set forth by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, Del. Bankr. L.R. 2016-2, and the Executive Office for the United States Trustee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct, to the best of my information, knowledge, and belief.

Executed on: July 25, 2023

FTI CONSULTING, INC.

By: /s/ Matthew Diaz

Matthew Diaz
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Financial Advisors to the Official
Committee of Unsecured Creditors of FTX
Trading Ltd., *et al.*